

**UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF MICHIGAN**

MAJD AL-SHARA,

Plaintiff,

vs.

Case No. 11-cv-14954

Hon. Paul D. Borman

WAL-MART STORES, INC.

and

WAL-MART STORES EAST, L.P.,

Defendants.

---

DIANE M. BRENEMAN (NOT SWORN)

STACY L. DUNGAN (NOT SWORN)

Breneman Dungan, LLC

311 Delaware

Kansas City, MO 64105

(816) 421-0114

[db@litigationkc.com](mailto:db@litigationkc.com)

[sd@litigationkc.com](mailto:sd@litigationkc.com)

NICOLE M. WRIGHT (P63513)

ZAUSMER, KAUFMAN, AUGUST,

CALDWELL & TAYLER, PC

Attorneys for Defendant Wal-Mart Stores,

Inc. and Wal-Mart Stores East, L.P.

31700 Middlebelt Rd., Suite 150

Farmington Hills, MI 48334

(248) 851-4111

[nwright@zkact.com](mailto:nwright@zkact.com)

RAMONA C. HOWARD (P48996)

McKeen Associates

645 Griswold St., Suite 4200

Detroit, MI 48226

(313) 961-4400

[rchoward@mckeenassociates.com](mailto:rchoward@mckeenassociates.com)

---

**WAL-MART DEFENDANTS'  
MOTION TO SEAL EXHIBIT B TO ITS MOTION FOR STAY OF PROCEEDINGS**

NOW COME Defendants, Wal-Mart Stores East, L.P., incorrectly sued as Wal-Mart Stores, Inc. (hereafter "Wal-Mart) by and through their attorneys, Zausmer, Kaufman, August,

Caldwell & Tayler, PC, and files this Motion to Seal Exhibit B, which will be offered as evidence in support of its Motion to Stay and, in support of this motion, states the following:

1. The information contained in Exhibit B, Exemplar Supplier Agreement between Wal-Mart and Blitz U.S.A, Inc. and dated February 3, 2010 constitutes confidential commercial information.

2. For this reason, the pleading should be filed under seal and not be disclosed to the public.

3. Pursuant to Local Rule 7.1, counsel for Defendants Wal-Mart explained the nature of this Motion and its legal basis, and requested, but did not obtain concurrence in the relief sought.

WHEREFORE, Defendants, Wal-Mart respectfully requests that this Court grant its Motion to Seal Exhibit B offered as evidence in support of its Motion to Stay.

Respectfully submitted,

ZAUSMER, KAUFMAN, AUGUST,  
CALDWELL & TAYLER, PC

/s/ Nicole M. Wright

---

NICOLE M. WRIGHT (P63513)  
Attorneys for Defendant Wal-Mart  
31700 Middlebelt Rd., Suite 150  
Farmington Hills, MI 48334  
(248) 851-4111  
[nwright@zkact.com](mailto:nwright@zkact.com)

Date: January 27, 2012

**PROOF OF SERVICE**

I, Carson J. Tucker, an attorney with the law firm of Zausmer, Kaufman, August, Caldwell & Tayler, PC, hereby state and affirm that on January 27, 2012 I caused to be served the foregoing pleadings upon counsel of record in the above-captioned case by filing same with the Court's electronic court filing system. This filing will send notification to the following attorneys of record for Plaintiff:

Diane M. Breneman;

Stacy L. Dungan; and

Ramona C. Howard

/s/ Carson J. Tucker

Zausmer, Kaufman, August, Caldwell &  
Tayler, PC

31700 Middlebelt Rd., Suite 150

Farmington Hills, MI 48334

(248) 851-4111